

1 PHILLIP A. TALBERT
2 United States Attorney
3 MATHEW W. PILE
4 Associate General Counsel
5 Office of Program Litigation, Office 7
6 CASPAR CHAN, CSBN 294804
7 Special Assistant United States Attorney
8 Social Security Administration
9 6401 Security Boulevard
10 Baltimore, MD 21235
11 Telephone: 510-970-4810
12 Facsimile: 415-744-0134
13 Email: Caspar.Chan@ssa.gov
14 Attorneys for Defendant

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

13 STACEY HAYWARD,

14 Plaintiff,

15 v.

16 COMMISSIONER OF SOCIAL SECURITY,

17 Defendant.
18
19

Civil No. 2:23-cv-02197-CKD

**STIPULATION AND ORDER FOR
VOLUNTARY REMAND**

1 IT IS HEREBY STIPULATED by and between the parties, through their undersigned attorneys,
2 and with the approval of the Court, that this action be remanded for further administrative action pursuant
3 to sentence four of 42 U.S.C. § 405(g). The purpose of the remand is to offer Plaintiff a new decision.

4 On remand, the Commissioner will offer Plaintiff an opportunity for a new hearing, further
5 develop the record as necessary, and issue a new decision. The parties further request that the Clerk of
6 the Court be directed to enter a final judgment in favor of Plaintiff, and against Defendant, reversing the
7 final decision of the Commissioner.
8

9 Date: March 7, 2024

LAW OFFICES OF FRANCESCO BENAVIDES

10 By: /s/ Caspar Chan for Francesco Benavides*
11 FRANCESCO BENAVIDES
12 *Authorized by email on March 7, 2024
13 Attorneys for Plaintiff

14 Date: March 7, 2024

PHILIP A. TALBERT
United States Attorney
Eastern District of California

16 By: /s/ Caspar Chan
17 CASPAR CHAN
18 Special Assistant United States Attorney
19 Attorneys for Defendant

20
21 ORDER

22 APPROVED AND SO ORDERED.

23 Dated: March 7, 2024

24 
25 CAROLYN K. DELANEY
26 UNITED STATES MAGISTRATE JUDGE
27
28